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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number: 5:24-cv-03811-EKL-SVK

PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

Hon. Eumi K. Lee
Magistrate Judge Susan van Keulen

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed in connection with the Exhibits 4 ("Ex. 4") and 5 ("Ex. 5") (collectively, the "Sealed Documents"),

filed in support of the Parties' Joint Discovery Statement Regarding Threshold Disputes as to Plaintiffs' Discovery Requests to Defendant.

The following portions of Exhibits 4 and 5 all reference or discuss information produced by Defendant Anthropic PBC ("Anthropic") and designated as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY":

Document	Text to be Sealed/Redacted
Ex. 4, ECF No. 246-2	Highlighted portions at: pp. 17, 22–23.
Ex. 5, ECF No. 246-3	Highlighted portions at: pp. 7–18.

Publishers do not take any position on whether the information so designated is confidential or entitled to sealing or redaction. Publishers bring this motion for the purpose of complying with the Parties' Stipulated Protective Order entered in this case in the Middle District of Tennessee, ECF No. 62, and the Civil Local Rules of this District. Accordingly, the Sealed Documents will be submitted provisionally under seal or redacted with this Administrative Motion, subject to Anthropic's filing of a statement and/or declaration pursuant to Civil L.R. 79-5(f)(3).

Dated: October 1, 2024

Respectfully submitted,

/s/ Timothy Chung

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